

**BEFORE THE
STATE CORPORATION COMMISSION
OF THE COMMONWEALTH OF VIRGINIA**

Ex Parte: Establishment of Carrier :
Performance Standards for Verizon : **Case No. PUC010206**
Virginia Inc. :

**VERIZON VIRGINIA INC.'s
PROPOSED IMPLEMENTATION SCHEDULE
FOR THE VA GUIDELINES**

Verizon Virginia Inc. ("Verizon VA") submits the following implementation schedule for the proposed "Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports" ("VA Guidelines").

For those measured items in the VA Guidelines for which performance data is currently being reported under identical measurements in the August 11, 2000 "Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports" ("KPMG Test Metrics"), Verizon VA proposes that it will begin collecting performance data and performing measurements for these measured items pursuant to the VA Guidelines for the second calendar month after the month in which the Commission approves the VA Guidelines.¹ For most of the remaining measured items, Verizon VA will begin collecting performance data and performing measurements under the VA Guidelines for the third calendar month after the month in which the Commission approves the VA

¹ For instance, for measured items where Verizon VA will begin collecting performance data and performing measurements for the second calendar month after the month in which the VA Guidelines are approved by the Commission, if the Commission approved the VA Guidelines in October 2001, Verizon VA's first performance report under the VA Guidelines would show Verizon VA's performance for the month of December 2001. This report would be issued at the end of January 2002 and include performance data for December 2001.

Guidelines.² For a small portion of the measured items, a longer implementation interval is proposed.³ A list of the implementation intervals for the VA Guidelines measurements is set out in Attachment A.

Before Verizon VA can begin to report service quality performance data, it must undertake a wide range of complex activities. It will be reporting data for hundreds of separate measurements. In order to do this, Verizon VA will need to implement the systems and business processes necessary to collect the performance data. It will also need to institute the calculation methodologies required to process the performance data that is collected.

After Verizon VA has begun to collect and process performance data, it must conduct a review to confirm that the applicable systems, business processes and calculation methodologies are working properly and are fully and accurately collecting and reporting the data. The collection, processing and reporting of performance data for the many measurements that Verizon VA will perform is a very complex undertaking. It is essential that Verizon VA be able to ensure that the measurements it reports are accurate.

While Verizon VA will be able to implement measurement and reporting under the VA Guidelines for items that are currently measured under identical KPMG Test

² For instance, for measured items where Verizon VA will begin collecting performance data and performing measurements for the third calendar month after the month in which the VA Guidelines are approved by the Commission, if the Commission approved the VA Guidelines in October 2001, Verizon VA's first performance report would show Verizon VA's performance for the month of January 2002. This report would be issued at the end of February 2002 and include performance data for January 2002.

³ For a small number of the measurements, Verizon VA proposes that it will begin collecting performance data and performing measurements for the fourth calendar month after the month in which the Commission approves the VA Guidelines. For these measurements, if the Commission approved the VA Guidelines in October 2001, Verizon VA's first performance report would show Verizon VA's performance for the month of February 2002. This report would be issued at the end of March 2002 and include performance data for February 2002.

Metrics measurements more quickly than for items that will be measured for the first time under the VA Guidelines, some implementation steps will still be necessary to begin measurement under the VA Guidelines of items measured under identical KPMG Test Metrics measurements. In particular, Verizon VA will need to again compare the KPMG Test Metrics measurements to the VA Guidelines measurements to confirm that they are the same. If further review shows that the measurements are not the same, Verizon VA will need to make the necessary modifications to its measurement processes to conform the measurements to the VA Guidelines requirements.⁴ Verizon VA will also need to create a new measurement report template for the VA Guidelines measurements and confirm that it has accurately incorporated into that report template the KPMG Test Metrics measurements.

The intervals that Verizon VA is proposing are set to allow Verizon VA to properly perform the necessary implementation work. It is imperative that the Commission give Verizon VA the time that it needs to implement a process that will result in complete and accurate performance reports.

⁴ If the time needed to make these modifications will result in a delay in implementation of the measurement, Verizon VA will notify the Commission of the revised implementation interval for the measurement.

Conclusion

The Commission should adopt the implementation schedule proposed by Verizon
VA.

Respectfully submitted,

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ATTACHMENT A

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
	PRE-ORDERING	
PO-1-01	Average Response Time; Customer Service Record	3rd Month after Commission Order
PO-1-02	Average Response Time; Due Date Availability	3rd Month after Commission Order
PO-1-03	Average Response Time; Address Validation	3rd Month after Commission Order
PO-1-04	Average Response Time; Product and Service Availability	3rd Month after Commission Order
PO-1-05	Average Response Time; TN Reservation	3rd Month after Commission Order
PO-1-06	Average Response Time; Mechanized Loop Qual - DSL	3rd Month after Commission Order
PO-1-07	Average Response Time; Rejected Query	3rd Month after Commission Order
PO-1-08	% Timeouts	3rd Month after Commission Order
PO-1-09	Parsed CSR	3rd Month after Commission Order
PO-2-01	OSS Interface Availability -Total	3rd Month after Commission Order
PO-2-02	OSS Interface Availability - Prime Time	3rd Month after Commission Order
PO-2-03	OSS Interface Availability - Non Prime Time	3rd Month after Commission Order
PO-3-01	Average Speed of Answer - Ordering	3rd Month after Commission Order
PO-3-02	% Answer within 30 Seconds - Ordering	3rd Month after Commission Order
PO-3-03	Average Speed of Answer - Repair	3rd Month after Commission Order
PO-3-04	% Answer within 30 Seconds - Repair	3rd Month after Commission Order
PO-4-01	% Change Management Notices Sent on Time	2nd Month after Commission Order
PO-4-02	Change Management Notice Delay (1-7 Days late)	2nd Month after Commission Order
PO-4-03	Change Management Notice Delay (8 + Days late)	2nd Month after Commission Order
PO-5-01	Average Notification of Interface Outage	2nd Month after Commission Order
PO-6-01	Software Validation	3rd Month after Commission Order
PO-7-01	% Software Problem Resolution Timeliness	2nd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
PO-7-02	Delay Hours-Software Resolution-No Workaround	2nd Month after Commission Order
PO-7-03	Delay Days-Software Resolution-Workaround	2nd Month after Commission Order
PO-7-04	Delay Hours-Failed Test Deck Transactions - No Workaround	3rd Month after Commission Order
PO-8-01	Average Response Time - Manual Loop Qualification	4th Month after Commission Order
PO-8-02	% On Time - Engineering Record Request	2nd Month after Commission Order
ORDERING		
OR-1-01	Avg. LSRC Time - Flow Through	3rd Month after Commission Order
OR-1-02	% On Time LSRC - Flow Through	3rd Month after Commission Order
OR-1-03	Avg. LSRC/ASRC Time - No Facility Check (Electronic)	3rd Month after Commission Order
OR-1-04	% On Time LSRC/ASRC - No Facility Check (E)	3rd Month after Commission Order
OR-1-05	Avg. LSRC/ASRC Time - Facility Check (E)	3rd Month after Commission Order
OR-1-06	% On Time LSRC/ASRC - Facility Check (E)	3rd Month after Commission Order
OR-1-07	Avg. ASRC Time - No Facility Check (Fax)	3rd Month after Commission Order
OR-1-08	% ASRC On Time - No Facility Check (Fax)	3rd Month after Commission Order
OR-1-09	Avg. ASRC Time - Facility Check (Fax)	3rd Month after Commission Order
OR-1-10	% ASRC Time - Facility Check (Fax)	3rd Month after Commission Order
OR-1-11	Average FOC Time - Trunks <= 192	2nd Month after Commission Order
OR-1-11	Average FOC Time - Trunks > 192	3rd Month after Commission Order
OR-1-12	% On Time FOC - Trunks <= 192	2nd Month after Commission Order
OR-1-12	% On Time FOC - Trunks > 192	3rd Month after Commission Order
OR-1-13	% On Time DLR	3rd Month after Commission Order
OR-1-19	% On Time Response- Request for Inbound Augment Trunks	2nd Month after Commission Order
OR-2-01	Avg. LSR Reject Time - Flow Through	3rd Month after Commission Order
OR-2-02	% On Time LSR Reject - Flow Through	3rd Month after Commission Order
OR-2-03	Avg. LSR/ASR Reject Time - No Facility Check (Electronic)	3rd Month after Commission Order
OR-2-04	% On Time LSR/ASR Reject - No Facility Check (E)	3rd Month after Commission Order
OR-2-05	Avg. LSR/ASR Reject Time - Facility Check (E)	3rd Month after Commission Order
OR-2-06	% On Time LSR/ASR Reject - Facility Check (E)	3rd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
OR-2-07	Avg. Reject Time - No Facility Check (Fax)	3rd Month after Commission Order
OR-2-08	% On Time Reject - No Facility Check (Fax)	3rd Month after Commission Order
OR-2-09	Avg. Reject Time - Facility Check (Fax)	3rd Month after Commission Order
OR-2-10	% On Time Reject - Facility Check (Fax)	3rd Month after Commission Order
OR-2-11	Avg Trunk ASR Reject Time	2nd Month after Commission Order
OR-2-12	% On Time Trunk ASR Reject	2nd Month after Commission Order
OR-3-01	% Rejects	2nd Month after Commission Order
OR-3-02	% Resubmission Not Rejected	3rd Month after Commission Order
OR-4-01	Completion Notice - Avg. Response Time	2nd Month after Commission Order
OR-4-02	Completion Notice - % On Time	2nd Month after Commission Order
OR-4-04	Work Completion Notice - Average Response Time	2nd Month after Commission Order
OR-4-05	Work Completion Notice - % On Time	2nd Month after Commission Order
OR-4-06	Average Duration - Work Completion (SOP) to Bill Completion	2nd Month after Commission Order
OR-4-07	% SOP to Bill Completion >=5 Business Days	2nd Month after Commission Order
OR-4-08	% SOP to Bill Completion > 1 Business Day	2nd Month after Commission Order
OR-4-11	% Completed orders w/out PCN/BCN	3rd Month after Commission Order
OR-4-12	% Due Date to PCN within 2 Business Days	4th Month after Commission Order (see Exhibit 1)
OR-4-13	% Due Date to PCN within 5 Business Days	4th Month after Commission Order (see Exhibit 1)
OR-4-14	% Due Date to BCN within 4 Business Days	4th Month after Commission Order (see Exhibit 1)
OR-4-15	% Due Date to BCN within 7 Business Days	4th Month after Commission Order (see Exhibit 1)
OR-5-01	% Flow Through - Total	2nd Month after Commission Order
OR-5-02	% Flow Through - Simple	2nd Month after Commission Order
OR-5-03	% Flow Through - Achieved	2nd Month after Commission Order
OR-6-01	% Accuracy - Orders - Resale	2nd Month after Commission Order
OR-6-01	% Accuracy - Orders - All Other Products	3rd Month after Commission Order
OR-6-02	% Accuracy - Opportunities - Resale	2nd Month after Commission Order
OR-6-02	% Accuracy - Opportunities - All Other Products	3rd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
OR-6-03	% Accuracy - LSRC (Interim Measure)	Not Reported. Long Term Measure will be reported.
OR-6-03	% Accuracy - LSRC (Long Term Measure)	3rd Month after Commission Order
OR-7-01	% Order Confirmation/Rejects Sent within 3 Business Days	2nd Month after Commission Order
OR-8-01	% Acknowledgements on Time	2nd Month after Commission Order
OR-9-01	% Acknowledgement Completeness	2nd Month after Commission Order
PROVISIONING		
PR-1-01	Avg. Offered Interval -Total No Dispatch - Resale 2 Wire Digital Services, UNE 2 Wire Digital Services, UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-1-01	Avg. Offered Interval -Total No Dispatch - All Other Products	2nd Month after Commission Order
PR-1-02	Avg. Offered Interval -Total Dispatch - Resale 2 Wire Digital Services, UNE 2 Wire Digital Services, UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-1-02	Avg. Offered Interval - Total Dispatch - All Other Products	2nd Month after Commission Order
PR-1-03	Avg. Offered Interval - Dispatch (1-5 lines)	2nd Month after Commission Order
PR-1-04	Avg. Offered Interval - Dispatch (6-9 lines)	2nd Month after Commission Order
PR-1-05	Avg. Offered Interval - Dispatch (10+ lines)	2nd Month after Commission Order
PR-1-06	Avg. Offered Interval - DS0	2nd Month after Commission Order
PR-1-07	Avg. Offered Interval - DS1	2nd Month after Commission Order
PR-1-08	Avg. Offered Interval - DS3	2nd Month after Commission Order
PR-1-09	Avg. Offered Interval - Total	2nd Month after Commission Order
PR-1-12	Avg. Offered Interval - Disconnects	3rd Month after Commission Order
PR-2-01	Avg. Interval Completed -Total No Dispatch - Resale 2 Wire Digital Services, UNE 2 Wire Digital Services, UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-2-01	Avg. Interval Completed -Total No Dispatch - All Other Products	2nd Month after Commission Order
PR-2-02	Avg. Interval Completed - Total Dispatch - Resale 2 Wire Digital Services, UNE 2 Wire Digital Services, UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-2-02	Avg. Interval Completed - Total Dispatch - All Other Products	2nd Month after Commission Order
PR-2-03	Avg. Interval Completed - Dispatch (1-5 lines)	2nd Month after Commission Order
PR-2-04	Avg. Interval Completed - Dispatch (6-9 lines)	2nd Month after Commission Order
PR-2-05	Avg. Interval Completed - Dispatch (10+ lines)	2nd Month after Commission Order
PR-2-06	Avg. Interval Completed - DS0	2nd Month after Commission Order
PR-2-07	Avg. Interval Completed - DS1	2nd Month after Commission Order
PR-2-08	Avg. Interval Completed - DS3	2nd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
PR-2-09	Avg. Interval Completed - Total - Trunks	3rd Month after Commission Order
PR-2-09	Avg. Interval Completed - Total - All Other Products	2nd Month after Commission Order
PR-2-18	Avg. Interval Completed - Disconnect	3rd Month after Commission Order
PR-3-01	% Completed w/in 1 Day (1-5 lines) No Disp.	2nd Month after Commission Order
PR-3-02	% Completed w/in 2 Days (1-5 lines) No Disp.	2nd Month after Commission Order
PR-3-03	% Completed w/in 3 Days (1-5 lines) No Disp. - UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-3-03	% Completed w/in 3 Days (1-5 lines) No Disp.- All Other Products	2nd Month after Commission Order
PR-3-04	% Completed w/in 1 Day (1-5 lines) Dispatch	2nd Month after Commission Order
PR-3-05	% Completed w/in 2 Days (1-5 lines) Dispatch	2nd Month after Commission Order
PR-3-06	% Completed w/in 3 Days (1-5 lines) Dispatch	2nd Month after Commission Order
PR-3-07	% Completed w/in 4 Days (1-5 lines) Total	2nd Month after Commission Order
PR-3-08	% Completed w/in 5 Days (1-5 lines) - No Dispatch	2nd Month after Commission Order
PR-3-09	% Completed w/in 5 Days (1-5 lines) - Dispatch	2nd Month after Commission Order
PR-3-10	% Completed w/in 6 Days (1-5 lines) Total - UNE 2 Wire Digital Services, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-3-10	% Completed w/in 6 Days (1-5 lines) Total - All Other Products	2nd Month after Commission Order
PR-3-11	% Completed w/in 9 Days (1-5 lines) Total	3rd Month after Commission Order
PR-4-01	% Missed Appt. - Verizon - Total - Trunks	3rd Month after Commission Order
PR-4-01	% Missed Appt. - Verizon - Total - All Other Products	2nd Month after Commission Order
PR-4-02	Average Delay Days - Total - UNE EEL, UNE, IOF, UNE 2 Wire xDSL Line Sharing and UNE 2 Wire xDSL Loops	3rd Month after Commission Order
PR-4-02	Average Delay Days - Total - All Other Products	2nd Month after Commission Order
PR-4-03	% Missed Appt. - Customer - UNE EEL, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-4-03	% Missed Appt. - Customer - All Other Products	2nd Month after Commission Order
PR-4-04	% Missed Appt. - Verizon - Dispatch - UNE Loop Hot Cut, UNE 2 Wire Digital Services, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-4-04	% Missed Appt. - Verizon - Dispatch - All Other Products	2nd Month after Commission Order
PR-4-05	% Missed Appt. - Verizon - No Dispatch - UNE Loop-Hot Cut and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-4-05	% Missed Appt. - Verizon - No Dispatch - All Other Products	2nd Month after Commission Order
PR-4-07	% On Time Performance - LNP	2nd Month after Commission Order
PR-4-08	% Missed Appt. - Customer - Due to Late LSRC - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-4-08	% Missed Appt. - Customer - Due to Late LSRC - All Other Products	2nd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
PR-4-14	% Completed On Time - 2 Wire xDSL Loops	3rd Month after Commission Order
PR-5-01	% Missed Appt. - Verizon - Facilities	3rd Month after Commission Order
PR-5-02	% Orders Held for Facilities > 15 Days	3rd Month after Commission Order
PR-5-03	% Orders Held for Facilities > 60 Days	3rd Month after Commission Order
PR-6-01	% Installation Troubles Rept. W/in 30 Days - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-6-01	% Installation Troubles Rept. W/in 30 Days - All Other Products	2nd Month after Commission Order
PR-6-02	% Installation Troubles Rept. W/in 7 Days - UNE POTS-Loop Hot Cut	3rd Month after Commission Order
PR-6-02	% Installation Troubles Rept. W/in 7 Days - All Other Products	2nd Month after Commission Order
PR-6-03	% Install. Trble. Rept. W/in 30 Days-FOK/TOK/CPE - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-6-03	% Install. Trble. Rept. W/in 30 Days-FOK/TOK/CPE - All Other Products	2nd Month after Commission Order
PR-7-01	% Orders with Jeopardy Status	2nd Month after Commission Order
PR-8-01	Open Orders in a Hold Status >30 Days - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-8-01	Open Orders in a Hold Status >30 Days - All Other Products	2nd Month after Commission Order
PR-8-02	Open Orders in a Hold Status >90 Days - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
PR-8-02	Open Orders in a Hold Status >90 Days - All Other Products	2nd Month after Commission Order
PR-9-01	% On Time Performance - Hot Cut	2nd Month after Commission Order
PR-9-08	Average Duration of Service Interruption	2nd Month after Commission Order
PR-9-09	% Supplemented or Cancelled Orders at Verizon Request	2nd Month after Commission Order
MAINTENANCE/REPAIR		
MR-1-01	Average Response Time - Create Trouble	3rd Month after Commission Order
MR-1-02	Average Response Time - Status Trouble	3rd Month after Commission Order
MR-1-03	Average Response Time - Modify Trouble	3rd Month after Commission Order
MR-1-04	Average Response Time - Cancel Trouble	3rd Month after Commission Order
MR-1-05	Average Response Time - Trouble Report History	3rd Month after Commission Order
MR-1-06	Average Response Time - Test Trouble	3rd Month after Commission Order
MR-2-01	Network Trouble Report Rate	3rd Month after Commission Order
MR-2-02	Network Trouble Report Rate - Loop - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-2-02	Network Trouble Report Rate - Loop - All Other Products	2nd Month after Commission Order
MR-2-03	Network Trouble Report Rate - Central Office - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-2-03	Network Trouble Report Rate - Central Office - All Other Products	2nd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
MR-2-04	% Subsequent Reports - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-2-04	% Subsequent Reports - All Other Products	2nd Month after Commission Order
MR-2-05	% CPE/TOK/FOK Trouble Report Rate - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-2-05	% CPE/TOK/FOK Trouble Report Rate - All Other Products	2nd Month after Commission Order
MR-3-01	% Missed Repair Appt. - Loop - Resale POTS Business, Resale POTS Residence, UNE Platform Business, UNE Platform Residence, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-3-01	% Missed Repair Appt. - Loop - All Other Products	2nd Month after Commission Order
MR-3-02	% Missed Repair Appt. - Central Office - Resale POTS Business, Resale POTS Residence, UNE Platform Business, UNE Platform Residence, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-3-02	% Missed Repair Appt. - Central Office - All Other Products	2nd Month after Commission Order
MR-3-03	% Missed Repair Appt. - FOK,TOK,CPE - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-3-03	% Missed Repair Appt. - FOK,TOK,CPE - All Other Products	2nd Month after Commission Order
MR-3-04	% Missed Repair Appt. - No Double Dispatch - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-3-04	% Missed Repair Appt. - No Double Dispatch - All Other Products	2nd Month after Commission Order
MR-3-05	% Missed Repair Appt. - Double Dispatch - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-3-05	% Missed Repair Appt. - Double Dispatch - All Other Products	2nd Month after Commission Order
MR-4-01	Mean Time to Repair - Total	2nd Month after Commission Order
MR-4-02	Mean Time to Repair - Loop - Resale POTS Business, Resale POTS Residence, UNE Platform Business, UNE Platform Residence, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-02	Mean Time to Repair - Loop - All Other Products	2nd Month after Commission Order
MR-4-03	Mean Time to Repair - Central Office - Resale POTS Business, Resale POTS Residence, UNE Platform Business, UNE Platform Residence, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-03	Mean Time to Repair - Central Office - All Other Products	2nd Month after Commission Order
MR-4-04	% Cleared (all troubles) w/in 24 Hours - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-04	% Cleared (all troubles) w/in 24 Hours - All Other Products	2nd Month after Commission Order
MR-4-05	% OOS > 2 Hours	2nd Month after Commission Order
MR-4-06	% OOS > 4 Hours - Resale POTS	3rd Month after Commission Order
MR-4-06	% OOS > 4 Hours - All Other Products	2nd Month after Commission Order
MR-4-07	% OOS > 12 Hours - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-07	% OOS > 12 Hours - All Other Products	2nd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
MR-4-08	% OOS > 24 Hours - Resale POTS Business, Resale POTS Residence, UNE Platform Business, UNE Platform Residence, UNE 2 Wire xDSL Loops, and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-08	% OOS > 24 Hours - All Other Products	2nd Month after Commission Order
MR-4-09	Mean Time to Repair -No Double Dispatch - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-09	Mean Time to Repair -No Double Dispatch - All Other Products	2nd Month after Commission Order
MR-4-10	Mean Time to Repair - Double Dispatch - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-4-10	Mean Time to Repair - Double Dispatch - All Other Products	2nd Month after Commission Order
MR-5-01	% Repeat Reports w/in 30 Days - UNE 2 Wire xDSL Loops and UNE 2 Wire xDSL Line Sharing	3rd Month after Commission Order
MR-5-01	% Repeat Reports w/in 30 Days - All Other Products	2nd Month after Commission Order
NETWORK PERFORMANCE		
NP-1-01	% Final Trunk Groups Exceeding Blocking Standard	2nd Month after Commission Order
NP-1-02	% Final Trunk Groups Exceeding Blocking Standard - No Exceptions	2nd Month after Commission Order
NP-1-03	# of Final Trunk Groups Exceeding Blocking Standard - 2 Months	2nd Month after Commission Order
NP-1-04	# Final Trunk Groups Exceeding Blocking Standard - 3 Months	2nd Month after Commission Order
NP-2-01	% On Time Response to Request for Physical Collocation	3rd Month after Commission Order
NP-2-02	% On Time Response to Request for Virtual Collocation	3rd Month after Commission Order
NP-2-03	Average Interval - Physical Collocation	3rd Month after Commission Order
NP-2-04	Average Interval - Virtual Collocation	3rd Month after Commission Order
NP-2-05	% On Time - Physical Collocation	3rd Month after Commission Order
NP-2-06	% On Time - Virtual Collocation	3rd Month after Commission Order
NP-2-07	Average Delay Days - Physical Collocation	3rd Month after Commission Order
NP-2-08	Average Delay Days - Virtual Collocation	3rd Month after Commission Order
BILLING		
BI-1-01	% DUF in 3 Business Days	2nd Month after Commission Order
BI-1-02	% DUF in 4 Business Days	2nd Month after Commission Order

PROPOSED VA C2C METRICS

METRIC #	METRIC TITLE	1st DATA COLLECTION MONTH
BI-1-03	% DUF in 5 Business Days	2nd Month after Commission Order
BI-1-04	% DUF in 8 Business Days	2nd Month after Commission Order
BI-2-01	Timeliness of Carrier Bill	3rd Month after Commission Order
BI-3-01	% Billing Adjustments-Dollars Adjusted	3rd Month after Commission Order
BI-3-02	% Billing Adjustments-Number of Adjustments	3rd Month after Commission Order
	OPERATOR SERVICES/DIRECTORY ASSISTANCE	
OD-1-01	Average Speed of Answer - Operator Services	2nd Month after Commission Order
OD-1-02	Average Speed of Answer - Directory Assistance	2nd Month after Commission Order
	NEW OR MODIFIED METRICS	
	New Metrics	See Exhibit 1
	Modified Metrics	See Exhibit 1

EXHIBIT 1

1. Metrics OR-4-12 through 15.

These metrics measure the timeliness of Verizon VA's provision of order completion notices to the CLECs. Although these metrics are included in the New York Guidelines, they have not actually been implemented in New York. As a result, Verizon VA will have to perform more work to implement these metrics than will be necessary for the other VA Guidelines metrics. Because of this, there is the potential that the implementation interval for these metrics may need to be extended beyond the fourth calendar month after the Commission approves the VA Guidelines. If Verizon VA needs to extend the implementation interval for these metrics, it will notify the Commission of the extension.

2. New Metrics

Some CLECs have proposed adoption of metrics not currently contained in the New York Guidelines: (1) OR-6-04, which will measure directory listing accuracy; (2) PR-3-08, UNE Hot Cuts, which will measure the timeliness of performance of Hot Cuts; (3) PR-5-04, which will measure the percentage of orders cancelled after 5 days for no facilities; and, (4) PR-9-02, which will measure the percentage of Hot Cuts that are performed prior to the scheduled time.

Verizon VA will file comments opposing the adoption of Metrics PR-3-08, Hot Cuts, and PR-5-04 prior to their adoption in New York. At such time as Metrics PR-3-08, Hot Cuts, and PR-5-04 are adopted in New York and then submitted by Verizon VA to the Commission for its consideration, Verizon VA will submit to the Commission a proposed implementation schedule for these metrics.

Because collaborative participants have not yet reached consensus on Metric OR-6-04, Verizon VA is not in a position at this time to estimate how much time will be needed to implement this metric. When Metric OR-6-04 is adopted by the Commission, Verizon VA will submit an implementation schedule for this metric to the Commission for its consideration.

Metric PR-9-02 is measured and reported under the KPMG Test Metrics. Verizon VA will begin collecting performance data and performing measurements under the VA Guidelines for this metric for the second calendar month after the month in which the VA Guidelines are approved by the Commission.

3. Modifications to Metrics

Verizon VA's proposed implementation intervals for the metrics assume that the metrics that will be adopted by the Commission will be the metrics that have been proposed by Verizon VA. If the Commission changes a metric that has been proposed by Verizon VA (which it should not), the interval needed to implement the metric may have to be extended.